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March 26, 2025

Via ECF

Hon. Denise L. Cote
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Peter Gould v. 54 Below LLC*
Case No: 1:24-cv-09262-DLC

Dear Judge Cote:

This firm represents plaintiff Peter Gould ("*Plaintiff*") in the above-captioned matter and writes to respectfully request an extension of time to file a dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) or otherwise re-open the case.

The original filing deadline is March 28, 2025. [Dkt. No. 22]. No previous requests for an extension of time have been sought and as such, no previous requests for an extension have been granted or denied. Despite the parties' best efforts, the settlement transaction will not be consummated by the original deadline. In light of the upcoming deadline, Plaintiff respectfully requests a 30-day extension. Defendant consents to the requested extension and no other dates will be impacted as all pending conferences have been cancelled. The parties are requesting a one-time extension and are confident that no further extensions will be needed.

Thank you for your consideration of this request.

Gr. Had.
Denise Cote
3/26/25

Respectfully submitted,

SANDERS LAW GROUP

/s Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert